

SO. CAL. EQUAL ACCESS GROUP
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Attorneys for Plaintiff
MICHAEL HARRIS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MICHAEL HARRIS,
Plaintiff,
vs.

PILAR MERINO-CONTRERAS D/B/A
MERINO SALON; CHI HONG CHIANG,
AS TRUSTEE OF THE CHIANG
FAMILY TRUST; and DOES 1 to 10,
Defendants.

Case No.: 5:24-cv-02343-JGB (DTBx)

**Plaintiff's Notice of Motion and Motion
for Default Judgment by Court**

Date: April 28, 2025
Time: 9:00 a.m.
Courtroom: 1

Honorable Judge Jesus G. Bernal

To Defendants PILAR MERINO-CONTRERAS D/B/A MERINO SALON; CHI HONG CHIANG, AS TRUSTEE OF THE CHIANG FAMILY TRUST; and the attorneys of record, if any: Please take notice that on April 28, 2025, at 9:00 a.m., or as soon thereafter as this matter may be heard by this Court located at 3470 Twelfth Street, Riverside, California, Plaintiff MICHAEL HARRIS will present Plaintiff's motion for default judgment against Defendants PILAR MERINO-CONTRERAS D/B/A MERINO SALON and CHI HONG CHIANG, AS TRUSTEE OF THE CHIANG FAMILY

1 TRUST. The Clerk has previously entered the default on said Defendants on January 13,
2 2025 (Dkt. #9) and February 25, 2025 (Dkt. #11), respectively.

3 At the time and place of hearing, Plaintiff will present proof of the following
4 matters: (1) Defendants PILAR MERINO-CONTRERAS D/B/A MERINO SALON and
5 CHI HONG CHIANG, AS TRUSTEE OF THE CHIANG FAMILY TRUST are not
6 minors, incompetent persons, or in military service or otherwise exempted under the
7 Soldier and Sailor's Civil Relief Act of 1940; (2) Defendants PILAR MERINO-
8 CONTRERAS D/B/A MERINO SALON and CHI HONG CHIANG, AS TRUSTEE OF
9 THE CHIANG FAMILY TRUST have not appeared in this action; and (3) Plaintiff is
10 entitled to judgment against said Defendant on account of the claims pleaded in the
11 complaint, to wit: a violation of the Americans with Disabilities Act.

12 The Plaintiff seeks a judgment in the amount of \$3,555.00 in attorney fees and
13 costs as set forth in the attached declaration of Jason J. Kim and an Order directing the
14 Defendants to: make alterations in such a manner that, to the maximum extent feasible,
15 the goods, services, facilities, privileges, advantages, or accommodations offered by
16 Defendants are readily accessible to and usable by individuals with disabilities at the
17 property located at or about 625 W. Holt Blvd., Ontario, California. This motion is based
18 on this notice, the declarations submitted in support of this motion, and other matters
19 which may be presented at the hearing.

20 Notice of the original motion for default judgment by court was served on
21 Defendants PILAR MERINO-CONTRERAS D/B/A MERINO SALON and CHI HONG
22 CHIANG, AS TRUSTEE OF THE CHIANG FAMILY TRUST on March 27, 2025 by
23 first class United States Mail, postage prepaid.

24
25 Dated: March 27, 2025

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26
27 By: /s/ Jason J. Kim
28 Jason J. Kim, Esq.
Attorneys for Plaintiff